

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	FCC 94-102
)	
Revision of the Commission's rules)	
to ensure compatibility with)	
enhanced 911 emergency calling systems)	CC Docket No 94-102
)	
)	RM-8143
To: The Commission)	

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE
SECRETARY

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Mar 17 1995

REPLY COMMENTS OF THE RURAL CELLULAR CORPORATION

Rural Cellular Corporation ("RCC"), by its attorney and pursuant to Section 1.415 of the Commission's Rules, submits the following reply comments to the comments submitted by various parties in response to the Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding.

I. STATEMENT OF INTEREST

Rural Cellular Corporation is a B band cellular radio licensee operating five Rural Service Areas in the state of Minnesota covering a population base of 620,000. Rural Cellular Corporation is a Minnesota corporation formed and owned by 40 Minnesota telephone companies who are very familiar with wireline E911 operations and are concerned about the imposition of wireline requirements on wireless operators within the period proposed by the Commission. While RCC supports the Commission's goal of wireless E911 services, RCC is concerned that the timetable and technical requirements proposed will be impossible for rural cellular operators to meet. Accordingly, RCC will be affected by the outcome of this proceeding.

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II. POSITION SUMMARY

Over 120 parties have filed comments in response to the NPRM on January 9, 1995. RCC's comments address the E911 proposal for Commercial Mobile Radio Service ("CMRS") providers and do not discuss issues related to E911 compatibility with private branch exchanges. In brief, RCC agrees with the Cellular Telecommunications Industry Association ("CTIA") and other commenters who have argued that the FCC's three phase proposal for the achievement of CMRS location identification capabilities is premature.¹ Accordingly, RCC supports CTIA and the other commenters who have suggested that the FCC form an Industry Advisory Committee to address the technical and policy issues associated with the provision of wireless E-911 services. In support whereof, the following is respectfully shown:

III. FOR THE SAKE OF THE PUBLIC WELFARE, THE COMMISSION MUST NOT ACT PREMATURELY OR OVERBROADLY IN IMPLEMENTING E911.

RCC, like a majority of commenters in this proceeding, supports the Commission's goal of broadening the availability of enhanced 911 ("E911") services to wireless telecommunications end users. RCC, however, like most wireless service providers, opposes the adoption of rules that would impose mandatory E911 compatibility requirements on rural cellular and other CMRS providers under the timetable proposed by the Commission in the

¹ See e.g., Comments of Vanguard Cellular Systems, Inc. ("Vanguard"); Nextel Communications, Inc. ("Nextel"); Personal Communications Industry Association ("PCIA"); ALLTEL Mobile Communications, Inc. ("ALLTEL"); and US WEST, Inc. ("US West").

NPRM. Under the Commission's proposed rules, a rural cellular licensee would have to be capable of identifying the location of a mobile unit with varying degrees of accuracy over a five year period. One year after adoption of the proposed rules, a wireless system must be capable of identifying the location of a mobile unit to the nearest cell site to the nearest PSAP. After three years, the information provided to the PSAP must include location and distance of the mobile unit from the cell site. After five years, the mobile unit must be capable of being located in a three-dimensional environment within a 125 meter radius (i.e., latitude, longitude and elevation).²

Currently, the technology needed to implement the Commission's goals is not available. Additionally, most PSAPs are not equipped to handle the information the Commission is proposing to be sent. According to PCIA, full deployment of Automatic Location Identification ("ALI") is not likely to occur before the year 2002. Given the remote likelihood that the technical issues facing the industry will not be resolved and equipment readily and economically available within the time frame proposed by the Commission, RCC cannot in good faith support the Commission's proposed time frame.

Furthermore, as a rural cellular operator, RCC would have even greater difficulty in meeting the time frames suggested by the Commission. There are many areas within RCC's rural service area

² Notice of Proposed Rulemaking in CC Docket No. 94-102, 9 FCC Rcd 6170, 6176-80 (1994).

where the public safety answering points ("PSAPs") are not technically capable of receiving the ALI functions described by the FCC in the NPRM. Hence, requiring national deployment would be meaningless. Accordingly, RCC urges the Commission to heed CTIA's advice and form an Industry Advisory Committee consisting of service providers, equipment manufacturers and PSAP operators to study and report on the technical and policy issues associated with implementing wireless E-911 services before adopting definitive standards and timing requirements.³ This consensual industry approach would benefit wireless subscribers, CMRS providers, PSAPs and equipment vendors by ensuring that sufficient technical capability and financial viability exists to meet the Commission's goals of providing universal E911 services. Failure to obtain industry input from all types of CMRS providers, including rural cellular providers, concerning the best methods for implementing E911 would not only be harmful to the public safety and welfare, but would be a disservice to those in need of emergency assistance.


Finally, RCC implores the Commission to consider the words of wisdom imparted by Commissioner Chong -- "think outside the box". CMRS is a wireless environment. The E911 environment that works for landline telephone will not be completely applicable in a wireless environment. Both the Commission and the PSAPs must understand this fact before meaningful E911 service can be deployed across the country.

³ In the event an Industry Advisory Committee is formed, RCC volunteers to serve on the Committee as a representative of rural cellular service providers.

For the foregoing reasons, Rural Cellular Corporation respectfully requests that the FCC take action consistent with the views expressed herein.

Respectfully submitted,

RURAL CELLULAR CORPORATION

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CERTIFICATE OF SERVICE

I, Caroline Hill, an employee of the Law Offices of Caressa D. Bennet, hereby certify that a copy of the foregoing "Reply Comments of the Rural Cellular Corporation" was mailed via first-class U.S. mail, postage prepaid, on March 17, 1995 to the following:

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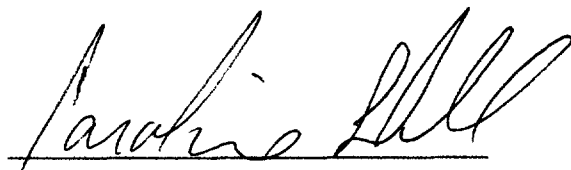
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A handwritten signature in black ink, appearing to read "Robert S. Foosaner", is written over a horizontal line.